

EXHIBIT 7

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
DOCKET NO. 84 CIV 1968 (JSR)

OLIN CORPORATION,

Plaintiff,

V.

LAMORAK INSURANCE COMPANY,

Defendant .

[illegible]

DEPOSITION UPON
ORAL EXAMINATION
OF
RANDALL W. GRIP

TRANSCRIPT of the stenographic notes of the proceedings in the above-entitled matter, as taken by and before ELLEN GODINO, a Certified Shorthand Reporter and Certified Realtime Reporter, held at the offices of JENNER & BLOCK, LLP, 919 Third Avenue, New York, New York, on Tuesday, February 27, 2018, commencing at 9:03 a.m.

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1801 Market Street - Suite 1800
Philadelphia, PA 19103

1 conversations with Newfields. Is that correct?

2 A. Well, I was on a conference call with
3 Newfields, but my assistant had conversations with
4 them, if they had a request for aerials or whatever.
5 I didn't have direct conversation with Newfields
6 that I recall, except on a conference call.

7 Q. Do you know if you spoke to any other
8 experts that Olin has retained in this case?

9 A. I don't recall so, unless you're
10 talking about a conference call. I don't recall
11 exactly everyone that was on that conference call.

12 Q. Do you remember talking to Billy Hall?

13 A. I remember his name. I'm assuming he
14 was on that call. You know, but I didn't have
15 direct discussion with him.

16 Q. Did you have any discussions with Neal
17 Brody?

18 A. No.

19 Q. Did you have any discussions with Frank
20 Rovers?

21 A. No. Oh, I should say I met Mr. Brody
22 today for the first time. That's the only
23 discussions that I've had.

24 Q. Do you plan on giving your opinion at
25 trial that any of Olin's operations at any of these

1 sites caused environmental contamination?

2 A. Could you repeat the question, I'm
3 sorry?

4 MS. SUTTON: Could you read it back.
5 (Testimony reread.)

6 MR. SOBELMAN: Object to the form of
7 the question.

8 A. It's a fairly broad question, but my
9 analysis is limited to what features were visible
10 and where they are relative to contamination. I'm
11 interpreting and pointing out environmental
12 significantly features, and it's up to other experts
13 to determine what was in those pits or grading or
14 movement of materials over time.

15 Q. Did you identify any areas that you
16 believed were contaminated, or are you relying on
17 other experts to determine that?

18 MR. SOBELMAN: Object to form.

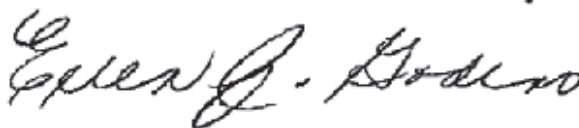
19 A. I've identified features that are
20 typically associated with contamination. I'm not
21 saying -- I'm not opining on what's in these pits,
22 what's in these piles of material; that's up to
23 others. But what I've done is I've identified when
24 it happened, where it happened, and how that area
25 was affected over time.

C E R T I F I C A T E

I, ELLEN J. GODINO, LICENSE NO. X101618, a Certified Shorthand Reporter and Certified Realtime Court Reporter, do hereby certify that prior to the commencement of the examination, RANDALL WAYNE GRIP was duly sworn by me to testify the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



ELLEN M. GODINO

Certified Court Reporter
Certified Realtime Reporter
of the State of New Jersey

DATED: March 4, 2018